

FEB 15 2008 UNITED STATES DISTRICT COURT
February 18, NORTHERN DISTRICT OF ILLINOIS
MICHAEL W. DOBBINS 2008 EASTERN DIVISION
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

v.

TOUSSAINT E. ANTHONY

) Case No. 08CR 0135

) Judge Maria Valdez

)

)

)

)

AFFIDAVIT OF INDICTMENT IN REMOVAL PROCEEDINGS

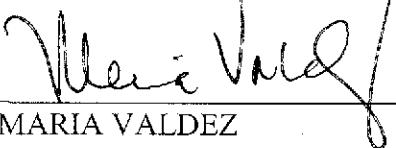
The undersigned Affiant personally appeared before Maria Valdez, a United States Magistrate Judge, and being duly sworn on oath, states: that in the Eastern District of Wisconsin, TOUSSAINT E. ANTHONY, was charged in an Indictment with a violation of Title 21, United States Code, Section 843(b), and that on the basis of Affiant's investigation and information received concerning the case through official channels, does hereby certify that Warrant for Arrest is outstanding for the arrest of said defendant. (See Attached - Warrant for Arrest and Indictment).

Wherefore, Affiant prays that the defendant be dealt with according to law.



Special Agent Scott Herbel
Federal Bureau of Investigation

Subscribed and Sworn to before me this
15th day of February, 2008.



MARIA VALDEZ

United States Magistrate Judge

AUSA HALLEY B. GUREN
(312) 886-4156

Bond set [or recommended] by issuing Court at _____

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

WARRANT FOR ARREST

TOUSSAINT E. ANTHONY;
(DOB: 11/08/1983)

CASE NUMBER: 08 CR 53

TO: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest and bring him forthwith to the nearest magistrate to answer an indictment charging him with knowingly and intentionally conspiring with others to distribute 500 grams or more of a mixture and substance containing cocaine and 5 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, both of which are Schedule II controlled substances, in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2

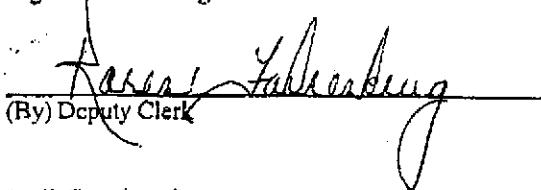
JOHN W. SANFILIPPO

Name of Judicial Officer

United States District Court Clerk

Title of Issuing Officer

Signature of Issuing Officer


(By) Deputy Clerk

Bail fixed at \$ _____

February 12, 2008, at Milwaukee, WI

Date and Location

U.S. District Court
Eastern Dist. of Wis.

I hereby certify that this is a
true and correct copy of the original record
remaining on record in my office

by _____

Name of Judicial Officer

RETURN		
This warrant was received and executed with the arrest of the above-named defendant at _____		
DATE RECEIVED: DATE OF ARREST:	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

'08 FEB 12 P 4:37

Plaintiff,

Case No.

JON ALEXANDER LIPPO

SEALED CLERK

08 CR 53

v.

EMANUEL PRINCE,
COREY BOVIA,
SAMIAH ABDALLAH,
TOUSSAINT E. ANTHONY,
JOHN BROWN,
KEITH CALLAHAN,
JERMAINE CARTER,
CROMMIE COLE,
EARNEST CROSS,
OTIS DUNNING,
BRANDON EASON,
WILLIE J. EVANS,
ANTOINE FLY,
DEJUAN GENTRY,
JOHNETIA GOLDEN,
OMAR GOLLAZ,
DUJUAN HARRISON,
ADRIAN HASKINS,
DEANDRE HENLEY,
GENE HENNING,
SERGIO HERNANDEZ,
ANTHONY JONES,
BRANDON LEVER,
LATRICE McNEAL,

KELVIN MOSS,
aka KEVIN MOSS,
CALVIN NASH,
GERALD PICHON,
ANNA PRESSLEY,
CHARLOTTE PRINCE,
MAURICE PORTER,
PABLO REYES-LANDAVERDE,
TYRONE J. REID,
COURTNEY ROBINSON,
A.C. SCOTT,
ANDRE SMITH,
TROY SMITH,
LENA TIDWELL,
TERRILL LESLIE TOLLIVER,
aka LESLIE TERRILL TOLLIVER,
THEODORE WILDER,
EQUANIS WILLIAMS,
JAMES E. WILLIAMS,
MARIO WILLIAMS,
ZAKEE WAHEED,
MICHAEL WARD, and
LAMAIN WILSON,

Defendants.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

1. Beginning in 2006 and continuing until on or about February 12, 2008, in the Eastern District of Wisconsin and elsewhere,

EMANUEL PRINCE,
COREY BOVIA,
KEITH CALLAHAN,
JERMAINE CARTER,
CROMMIE COLE,
WILLIE J. EVANS,
ANTOINE FLY,
JOHNETIA GOLDEN,
OMAR GOLLAZ,
DUJUAN HARRISON,
ADRIAN HASKINS,
DEANDRE HENLEY,
GENE HENNING,
SERGIO HERNANDEZ,
ANTHONY JONES,
BRANDON LEVER,
CALVIN NASH,
GERALD PICHON,
MAURICE PORTER,
PABLO REYES-LANDAVERDE,
TYRONE J. REID,
COURTNEY ROBINSON,
A.C. SCOTT,
TROY SMITH,
LENA TIDWELL,
TERRILL LESLIE TOLLIVER, aka LESLIE TERRILL TOLLIVER,
THEODORE WILDER,
JAMES E. WILLIAMS,
MARIO WILLIAMS,
ZAKEE WAHEED, and
MICHAEL WARD

knowingly and intentionally conspired with each other and with persons known and unknown to the grand jury to distribute controlled substances, in violation of Title 21, United States Code, Section

841(a)(1).

2. The offense involved 5 kilograms or more of a mixture and substance containing cocaine and 50 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, both of which are Schedule II controlled substances, and a mixture and substance containing marijuana, a Schedule I controlled substance.

3. The primary purpose of the conspiracy was to accumulate money, wealth, and other assets, through the transportation, distribution, and sale of powder cocaine, crack cocaine, and marijuana.

4. As part of the conspiracy and in furtherance thereof:

- a) Certain conspirators provided large amounts of money to obtain large quantities of cocaine and marijuana from other conspirators inside and outside of the Eastern District of Wisconsin, including in the Northern District of Illinois and elsewhere;
- b) Once the cocaine and marijuana were obtained, the drugs were distributed among members of the conspiracy for wholesale and retail distribution within the Eastern District of Wisconsin. The majority of the cocaine was converted into cocaine base, in the form of "crack" cocaine, by members of the conspiracy;
- c) The conspiracy used various residences to store, package, prepare, and distribute the cocaine, crack cocaine, and marijuana;
- d) Certain members of the conspiracy possessed firearms to protect the drugs and proceeds of the conspiracy; and
- e) Certain members of the conspiracy used acts of violence and threats to advance and protect the conspiracy, and in some cases inflicted serious bodily injuries upon their victims.

All in violation of Title 21, United States Code, Sections 846, 841(b)(1)(A), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

1. Beginning in 2006 and continuing until on or about February 12, 2008, in the Eastern District of Wisconsin and elsewhere,

**COREY BOVIA,
OTIS DUNNING,
ANNA PRESSLEY,
ANDRE SMITH, and
EQUANIS WILLIAMS**

knowingly and intentionally conspired with each other and with persons known and unknown to the grand jury to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. The offense involved 500 grams or more of a mixture and substance containing cocaine and 5 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, both of which are Schedule II controlled substances.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 15, 2007, at 4574 N. Teutonia Avenue, Milwaukee, Wisconsin, in the Eastern District of Wisconsin,

**EMANUEL PRINCE,
A.C. SCOTT, and
MICHAEL WARD**

knowingly and intentionally possessed with the intent to distribute 50 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance, and a mixture and substance containing marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 15, 2007, at 6643 W. Lisbon Avenue, #103, Milwaukee, Wisconsin,
in the Eastern District of Wisconsin,

EMANUEL PRINCE

knowingly and intentionally possessed with the intent to distribute 500 grams or more of a
mixture and substance containing cocaine, a Schedule II controlled substance; and a mixture and
substance containing marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT FIVE

THE GRAND JURY CHARGES THAT:

1. On or about November 5, 2007, in the Eastern District of Wisconsin,

DUJUAN HARRISON,

who previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as an Essex Arms .45 caliber semi-automatic pistol, with serial number SS210.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

On or about November 6, 2007, in the Eastern District of Wisconsin,

ZAKEE WAHEED

knowingly and intentionally attempted to distribute 5 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

On or about November 15, 2007, in the Eastern District of Wisconsin,

ANTHONY JONES

knowingly and intentionally possessed with the intent to distribute a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance, and a mixture and substance containing marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES:

On or about January 9, 2008, in the Eastern District of Wisconsin,

**DUJUAN HARRISON
KELVIN MOSS, aka KEVIN MOSS, and
TERRILL LESLIE TOLLIVER, aka LESLIE TERRILL TOLLIVER,**

knowingly and intentionally attempted to possess with the intent to distribute 50 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

COUNT NINE

THE GRAND JURY FURTHER CHARGES:

On or about January 18, 2008, in the Eastern District of Wisconsin,

**OMAR GOLLAZ,
SERGIO HERNANDEZ, and
PABLO REYES-LANDAVERDE**

knowingly and intentionally possessed with the intent to distribute 500 grams or more of a mixture and substance containing cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2008, in the Eastern District of Wisconsin,

EMANUEL PRINCE

did unlawfully and knowingly use and carry during and in relation to, and possess in furtherance of, a drug trafficking offense, for which he may be prosecuted in a court of the United States, that is Count One of this Indictment which is incorporated herein, a firearm, and did discharge that firearm during the offense.

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 27, 2008, in the Eastern District of Wisconsin,

COREY BOVIA

did unlawfully and knowingly use and carry during and in relation to, and possess in furtherance of, a drug trafficking offense, for which he may be prosecuted in a court of the United States, that is Counts One and Two of this Indictment which are incorporated herein, a firearm, and did discharge that firearm during the offense.

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES:

Beginning in 2006 and continuing until on or about February 12, 2008, in the Eastern District of Wisconsin and elsewhere,

LATRICE McNEAL,

having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, conspiracy to distribute controlled substances, concealed and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States.

All in violation of Title 18, United States Code, Section 4.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES:

Beginning in 2006 and continuing until on or about February 12, 2008, in the Eastern District of Wisconsin and elsewhere,

SAMIAH ABDALLAH,

having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, conspiracy to distribute controlled substances, concealed and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States.

All in violation of Title 18, United States Code, Section 4.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES:

Beginning in 2006 and continuing until on or about February 12, 2008, in the Eastern District of Wisconsin and elsewhere,

CHARLOTTE PRINCE,

having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, conspiracy to distribute controlled substances, concealed and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States.

All in violation of Title 18, United States Code, Section 4.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 22, 2007, in the Eastern District of Wisconsin,

TOUSSAINT E. ANTHONY

knowingly and intentionally used a communication facility, to wit: a telephone, in committing, or in causing and facilitating the commission of an act or acts constituting the attempted possession with the intent to distribute a controlled substance, a felony under the provisions of Title 21, Chapter 13, Subchapter I, of the United States Code.

All in violation of Title 21, United States Code, Section 843(b).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 20, 2008, in the Eastern District of Wisconsin,

JOHN BROWN

knowingly and intentionally used a communication facility, to wit: a telephone, in committing, or in causing and facilitating the commission of an act or acts constituting the attempted possession with the intent to distribute a controlled substance, a felony under the provisions of Title 21, Chapter 13, Subchapter I, of the United States Code.

All in violation of Title 21, United States Code, Section 843(b).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 11, 2008, in the Eastern District of Wisconsin,

EARNEST CROSS

knowingly and intentionally used a communication facility, to wit: a telephone, in committing, or in causing and facilitating the commission of an act or acts constituting the attempted possession with the intent to distribute a controlled substance, a felony under the provisions of Title 21, Chapter 13, Subchapter I, of the United States Code.

All in violation of Title 21, United States Code, Section 843(b).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 2, 2008, in the Eastern District of Wisconsin,

BRANDON EASON

knowingly and intentionally used a communication facility, to wit: a telephone, in committing, or in causing and facilitating the commission of an act or acts constituting the attempted possession with the intent to distribute a controlled substance, a felony under the provisions of Title 21, Chapter 13, Subchapter I, of the United States Code.

All in violation of Title 21, United States Code, Section 843(b).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 18, 2007, in the Eastern District of Wisconsin,

DEJUAN GENTRY

knowingly and intentionally used a communication facility, to wit: a telephone, in committing, or in causing and facilitating the commission of an act or acts constituting the attempted possession with the intent to distribute a controlled substance, a felony under the provisions of Title 21, Chapter 13, Subchapter I, of the United States Code.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 19, 2007, in the Eastern District of Wisconsin,

LAMAIN WILSON

knowingly and intentionally used a communication facility, to wit: a telephone, in committing, or in causing and facilitating the commission of an act or acts constituting the attempted possession with the intent to distribute a controlled substance, a felony under the provisions of Title 21, Chapter 13, Subchapter I, of the United States Code.

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE NOTICE

1. Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Four and Six through Nine of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 21 United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations. The properties subject to forfeiture include the following:

- A. A personal money judgment against each defendant charged in Counts One through Four, Eight, and Nine in the amount of \$1,000,000, an amount representing the unseized proceeds of the violations charged in these counts, and funds used to facilitate the violations;
- B. Approximately \$1,148 in cash seized from Pablo Reyes-Landaverde on January 18, 2008;
- C. Approximately \$1,798 in cash seized from Sergio Hernandez on January 18, 2008;
- D. A gray 2002 Hyundai Santa Fe GLS, WI registration 657-LNP, VIN KM8SC13D42U248974, registered to Salvador Hernandez, and presently in the possession of the Milwaukee Police Department;
- E. Approximately \$5,866 in cash seized from a gray 2002 Hyundai Santa Fe GLS, WI registration 657-LNP, VIN KM8SC13D42U248974, registered to Salvador Hernandez;
- F. A gray-green 2005 Pontiac Montana, WI registration 804-FKC, VIN1GMDV03L85D255581, registered to Omar Gollaz, and presently in the possession of the Milwaukee Police Department;
- G. A red 1973 Ford Mustang, WI registration 146352; VIN 3F05H117214, registered to Omar Gollaz;
- H. Approximately \$41,000 in cash seized from 1825 Superior Street, Racine, WI, on January 19, 2008;
- I. 52" Toshiba LCD TV -Model # 52HL167 seized from 1825 Superior Street,

Racine, WI, on January 19, 2008;

- J. Bose Gemstone surround sound speaker unit Model # 321GS; seized from 1825 Superior Street, Racine, WI, on January 19, 2008;
- K. Approximately \$17,000 in cash seized from 1501 Superior Street, Racine, WI, on January 19, 2008;
- L. Approximately \$40,000 in cash seized from inside a 1996 Dodge Intrepid, WI registration 452-DCS, which was in Chicory Storage, Locker #313, 1903 Chicory Road, Racine, WI, on January 19, 2008;
- M. Approximately \$14,603.77 seized from Omar Gollaz's Wells Fargo Account #701269XXXX, on January 22, 2008;
- N. Approximately \$15,235.44 seized from Omar Gollaz's Wells Fargo Account #701269XXXX, on January 22, 2008;
- O. Approximately \$45,691.14 seized from Sergio Hernandez's Wells Fargo Account # 973128XXXX, on January 22, 2008;
- P. A pewter 2002 Chevy Avalanche, Wisconsin registration ET-3352, VIN 3GNEC13T82G128937, presently in the possession of the Milwaukee Police Department;
- Q. A black 1997 BMW 528I, Wisconsin registration 443LYC, VIN WBADD6326VBW12282, registered to Kevin Moss, aka Kelvin Moss;
- R. A black 2000 Cadillac Escalade, VIN 1GYEK63R6YR190501, registered to Kevin Moss, aka Kelvin Moss;
- S. A green 2002 BMW 745, Illinois registration CHICO, VIN WBAGN63452DR05683, registered to DeAndre Henley;
- T. A multi-colored, flip-flop paint 1999 Lexus, Wisconsin registration 262LJG, VIN JT8BD68SXX0062617, registered to Courtney Robinson;
- U. A silver 2003 Pontiac Grand AM, Wisconsin registration 128MMZ, VIN 1G2NF52E03C100973, registered to Emanuel Prince and Latrice McNeal;
- V. A black 2001 Oldsmobile Aurora, Wisconsin registration 228MTK, VIN 1G3GS64CX14242160, registered to Emanuel Prince and Latrice McNeal;
- W. A red 2000 Cadillac DTS, Wisconsin registration 663LVX, VIN

1G6KF5499YU223545, registered to Keith Callahan;

- X. A green 1995 Chevrolet Tahoe, Wisconsin registration 510EHW, VIN 1GNEK18K3SJ414163, registered to Tyrone Reid;
- Y. A multi-colored 1968 Oldsmobile Cutlass convertible, Wisconsin registration 436LAP, VIN 336678M301500, registered to Corey Bovia;
- Z. An orange 2000 Pontiac Grand Prix, Wisconsin registration 662HFZ, VIN 1G2WJ52JXYF255973, registered to A.C. Scott and Charlotte Prince;
- AA. A black 1995 Chevrolet Camaro, Wisconsin registration 263MVD, VIN 2G1FP22S1S2159197, registered to Antoine Fly.

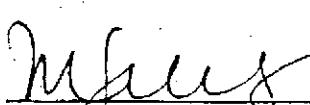
2. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL:



FOREPERSON

Date: 2-12-08



for: STEVEN M. BISKUPIC
United States Attorney